

STODDARD LAW OFFICE

P.O. BOX 716
BAYFIELD, WI 54814
glennstoddard@gmail.com

www.stoddardlawoffice.com

GLENN M. STODDARD
OFFICE: (715) 913-0043
DIRECT: (715) 864-3057

August 23, 2016

Via U.S. Mail & Email: tcabush@kasdorf.com

Attorney Thomas A. Cabush
Kasdorf, Lewis & Swietlik
One Park Plaza
11270 West Park Place, 5th Floor
Milwaukee, WI 53224

Re: *Thomas E. Nelson, et al. v. William Defoe, et al.*,
U.S. District Court for the Western District of Wisconsin
Case No. 15-cv-274-wmc

Dear Mr. Cabush:

Enclosed please find Plaintiffs' Notice of Acceptance of Offer of Judgment, pursuant to Rule 68, in the above-captioned case.

Please contact me to discuss entry of Judgment and terms of payment.

Sincerely,

STODDARD LAW OFFICE



Glenn M. Stoddard

Enclosure

cc: Attorney Carol N. Skinner (via email only)
Clients (via email only)

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

THOMAS E. NELSON,
KIRSTEN L. PEDERSEN,
Individually and as next friends and
guardians of JACK A. NELSON, and
SYLVIA E. NELSON,

Plaintiffs,

v.

Case No. 15-CV-274

WILLIAM DEFOE,
In his individual and official capacities,
GREGORY B. NELSON,
In his individual and official capacities,
JAMES PATTERSON,
In his individual and official capacities,
MIKE ANDERSON,
In his individual and official capacities,
MICHAEL CHILDERS,
In his individual and official capacities,
MIKE STARCK,
In his individual and official capacities,
JAMES M. PRICE, JR.,
In his individual and official capacities,
LISA POTSWALD,
In her individual and official capacities, and
TOWN OF LA POINTE, WISCONSIN,

Defendants.


PLAINTIFFS' NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT

TO: Defendant Town of La Pointe, Wisconsin
c/o Attorney Thomas A. Cabush
Kasdorf, Lewis & Swietlik, S.C.
One Park Plaza, Suite 500
11270 West Park Place
Milwaukee, WI 53224
Attorneys for Defendants William Defoe, Gregory B. Nelson, James Patterson, Mike
Anderson, Michael Childers, Mike Starck, James M. Price, Jr., Lisa Potswald, and Town
of La Pointe, Wisconsin

PLEASE TAKE NOTICE that pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiffs Thomas E. Nelson and Kirsten L. Pedersen, individually and as next friends and guardians of Jack A. Nelson and Sylvia E. Nelson, by their attorneys, Glenn M. Stoddard, of Stoddard Law Office, and Carol N. Skinner, of Skinner and Associates, hereby accept the "Offer of Judgment" made by Defendant Town of La Pointe, dated August 17, 2016, in the total sum of Three Hundred Thousand Dollars (\$300,000.00), a copy of which is attached hereto as Exhibit 1.

Dated this 23rd day of August, 2016.

STODDARD LAW OFFICE



Glenn M. Stoddard
Attorney for Plaintiffs
WI State Bar No. 1020964
Email: glennstoddard@gmail.com
P.O. Box 716
Bayfield, WI 54814
Tel: (715) 913-0043
Direct: (715) 864-3057

**CO-COUNSEL:
SKINNER AND ASSOCIATES**

By: /s/Carol N. Skinner
Carol N. Skinner
WI State Bar No. 1017307
Attorney for Plaintiff
212 Commercial Street
Hudson, WI 54016
Tel: (715) 386-5800
Email: cskinner@skinnerlaw.com

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

THOMAS E. NELSON,
KIRSTEN L. PEDERSEN,
Individually and as next friends and
guardians of JACK A. NELSON and
SYLVIA E. NELSON,

Case No. 15-CV-274

Plaintiffs,

v.

WILLIAM DEFOE, in his individual and
official capacities, GREGORY B. NELSON,
in his individual and official capacities,
JAMES PATTERSON, in his individual and
official capacities, MIKE ANDERSON, in his
individual and official capacities, MICHAEL CHILDERS,
in his individual and official capacities, MIKE STARCK,
in his individual and official capacities,
JAMES M. PRICE, JR., in his individual and official
capacities, LISA POTSWALD, in her individual and
official capacities, and
TOWN OF LA POINTE, WISCONSIN,

Defendants.


OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, the defendant, Town of La Pointe, offers to allow judgment to be taken against it in the total sum of Three Hundred Thousand and No/100ths Dollars (\$300,000.00), which includes all costs, attorney's fees and any and all other items of damage or expense that the plaintiffs may seek to recover in this lawsuit against all remaining defendants. This offer includes all liens.



Dated this 17th day of August, 2016.

KASDORF, LEWIS & SWIETLIK, S.C.
Attorneys for Defendants, William Defoe, Gregory
B. Nelson, James Patterson, Mike Anderson,
Michael Childers, Mike Starck, James M. Price, Jr.,
Lisa Potswald and Town of La Pointe, Wisconsin

By: 
Thomas A. Cabush
State Bar No. 1019433
Email: tcabush@kasdorf.com
Breanne F. Lynch
State Bar No. 1098926
Email: blynch@kasdorf.com

One Park Plaza, Suite 500
11270 West Park Place
Milwaukee, WI 53224
Phone: (414)577-4000
Fax: (414)577-4400